South Carolina
DHEC
Department of Health and Environmental Control
2600 Bull Street, Columbia, SC 29201

medley
6.4 V.3

July 9, 1992

Ralph Howard
Remedial Project Manager
U.S. EPA, Region IV
345 Courtland Street
Atlanta, GA 30365

RE: Medley Farms Remedial Design Planning Documents

Dear Mr. Howard:

The Remedial Design Workplan, Field Sampling and Analysis Plan, Quality Assurance Project Plan and the Health and Safety Plan for the Medley Farms Site have been reviewed. Comments on all documents will be included in this letter.

REMEDIAL DESIGN WORKPLAN

Page 1-2, Section 1.2

The document states that the final RD Workplan will be an enforceable part of the Medley Farms RD/RA Consent Decree. In this case, written approval of the document from the State should be given before EPA gives the Steering Committee final approval.

Page 2-5, Section 2.3, 1st Paragraph

The Risk Assessment indicated that the observed concentrations of VOCs and SVOCs in the unsaturated soils posed no health threat in the present conditions, but could pose a threat under the future use scenario.

Page 2-9, Section 2.5, Surface Water

The data and locations of surface water and sediment samples from both the RI and the Feb. 1992 sampling should be discussed. Show on the Data Point Location Map, Plate 1, the location of the Feb. 1992 sampling points, ie. RW05, RW06, SS05 and SS06.

Page 2-21, Section 2.8.2, Last Paragraph

What is the plan of action if the jet-pump system does not induce flow out of the upper bedrock by placing them in transition zone?

Page 3-1, Section 3.1

A point of interest needs to be cleared up. The ROD states on Page 94 Section 11.0: " review the existing groundwater monitoring system to **insure proper monitoring** of groundwater; if deemed necessary, additional monitoring wells will be installed to mitigate **any deficiencies** in the existing groundwater monitoring system." From the ROD to the CD, this statement has changed to the northeast area of site and in some instances RMT refers to the northwest portions of the site. The ROD does not mention any particular area, but refers to the whole site. I believe all monitoring wells should be sampled at least one more time. From the Feb. 1992 data, the plume has moved and needs to be defined as the ROD implies. Some of the wells that had hits of contaminants below the MCLs may now be at or above MCLs. The work that RMT proposes in the Northeast area is needed. However, the horizontal extent of the plume in both shallow and bedrock wells needs to be defined for the whole site to insure the proper design of the extraction well network. After sampling all wells, the results may indicate additional wells may be needed in other areas in addition to those proposed in the Northeast area.

Page 3-2, Section 3.3, 2nd Paragraph

The ROD states that the SVE system air emissions will be treated by the use of an in-line carbon adsorption system. Whether the system will be needed is not a decision left to the PRPs for this site.

Page 4-1, Section 4.1, Last Bullet

The remediation goals will be updated with any new or changed MCLs published in the federal registrar.

FIELD SAMPLING AND ANALYSIS PLAN

Page 1-5, Section 1.1

See the above comment about Page 3-1 of the RD Workplan concerning the requirements of additional groundwater sampling/investigations. Also on page 1-5 in Section 1.3, the ROD does not state that groundwater quality will be better defined in northeast quadrant.

Page 3-2, Section 3.1

The State believes it would be better to discharge to Jones Creek directly rather through it tributary from a ecological and environmental standpoint. Therefore, the two proposed sampling points for surface water and sediment should be moved to Jones Creek. The downstream location should be located near BW4. Since the creek has had only one

sampling round, sampling Jones Creek will give the data necessary to make a decision on the environmental impact of groundwater discharging to the creek while at the same time provide data to use in the NPDES process.

Attached are additional comments from our Hydrogeology Section. If you have any questions, please call me at (803) 734-5487.

Sincerely,

Richard Haynes

Richard Haynes
Site Engineer
Site Engineering Section
Bureau of Solid and Hazardous Waste Management

cc: Billy Britton